

January 8th, 2015

Dear FCC,

Chairman Tom Wheeler

Commissioner Mignon Clyburn Commissioner Jessica Rosenworcel Commissioner Ajit Pai Commissioner Michael O'Rielly c/o Marlene H. Dortch, Secretary **Federal Communications Commission** 445 12th Street, S.W. Washington, D.C. 20554

## BLOOMINGTON HIGH SCHOOL SOUTH HOME OF THE PANTHERS

1965 S Walnut St. Bloomington, IN 47401 P: (812) 330-7714 F: (812) 330-7810

http://www.mccsc.net/subsite/bhss

## Re: Comments in ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 via Electronic Filing

Dear Chairman Wheeler, Commissioners Clyburn, Rosenworcel, Pai, O'Rielly and Ms. Dortch,

On behalf of Bloomington High School South in Bloomington, Indiana I write with concern about protection for our wireless microphones and backstage communications devices. We are a member of the Educational Theatre Association (EdTA), the national voice of theatre education that includes more than 5,000 educators and 90,000 student members. The mission of EdTA is to provide theatre education opportunities for all students.

Bloomington High School South presents about 20 public performances a year, with more than 6,700 attendees annually. Our school theatre program relies on the revenue generated in these performances to sustain and grow our in- and afterschool theatre education opportunities for all of our 1,800 students. Wireless microphones are a fundamental aspect of our program, and understanding how to use them a critical component of our educational pedagogy, both for student performers and technicians.

I understand the Commission has ruled that performing arts entities that regularly use 50 or more wireless devices will be eligible to apply for a Part 74 license. I've also learned that the FCC is seeking Comment on a proposed rule that would prevent performing arts entities using fewer than 50 wireless devices from participating in the database. This would leave my school and thousands of others without any interference protection mechanism from the many TV Band Devices that may soon flood the market. Frequency coordination with other known wireless microphone users has become common practice, but there is no way to coordinate with TVBD's if you are unaware of them.

Thousands of performances are held by both educational and professional performing arts organizations each year and the use of wireless microphones is essential to producing high-quality performances and also mitigates against significant public safety concerns.

Mark Fletcher Principal

Jay True Assistant Principal Joe Doyle

Cindy Chrzastowski Assistant Principal

Christina Adduci **Assistant Principal**  **Assistant Principal** 

J.R. Holmes

Athletic Director





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Per the FCC's request for Public Comment, here are the details about our school's use of wireless devices:

At Bloomington High School South, we use anywhere from 5-17 wireless microphones and equipment controlling devices to run our presentations and productions. These performances occur about 20 times per academic year. They include athletic events, theatre productions, and honors awards nights.

We use VHF and High UHF for our devices. These devices tune to more than one frequency, with a tuning ability of about 80 MHz. Nine of our devices are analog while eight of our devices are digital, and all of our wireless equipment is owned as opposed to rented. We predict the life expectancy of our equipment to be about 1-2 years.

Because our funding for such equipment is limited, reimbursement would be a key part in allowing us to make these potential transitions more smoothly. Our self-funded theatre programs rely on this wireless equipment in order to run and continue to provide our students with enrichment. We would be more easily persuaded to move out of the TV band if we had received additional funding to make this transition possible for our programs.

I appreciate that the Commission has sought comment on these very important issues. I realize that the FCC is seeking a fair and reasonable solution to the TV band issues we are now facing, but that solution should allow *all* organizations—big and small, professional and educational—that some sort of interference protection. The currently proposed plan offers no such protection for many of us. Further, I would request that the Commission consider the burden already borne by the educational and performing arts community in vacating the 700 MHz band. I am concerned about the cost of once again replacing my school's sound equipment.

Theatre education programs are cornerstones of many schools cultural identity, nurturing 21<sup>st</sup>-century skills and knowledge for students and providing pride, entertainment, and dialogue in the communities, and contribute to the local economies. I respectfully request that the Commission maintain access to interference protection and establish a mechanism to reimburse educational and performing arts organizations for the cost of new equipment prompted by any proposed spectrum move.

Sincerely,

Gwen Witten Upchurch

Mark Fletcher Principal Jay True Assistant Principal Joe Doyle Assistant Principal

Christina Adduci Assistant Principal J.R. Holmes Athletic Director

